

EXHIBIT D

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September 9, 2014

By Email (Starbutton@cozen.com)

Scott Tarbutton, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103

Re: *In re Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (FM)
Yassin Abdullah Kadi

Dear Scott:

Now that we are approaching the end of document production, I am writing to follow up on our previous correspondence: my December 12, 2013 letter to you; your January 17 letter in response; and my May 7, 2014 letter to you.

I would like some confirmation that Plaintiffs intend to respond to Mr. Kadi's Interrogatories, dated September 30, 2013 and, assuming that Plaintiffs do intend to respond, a timeframe for when this will happen. If Plaintiffs do not intend to respond to our Interrogatories, we should schedule a meet and confer.

Also, since Plaintiffs made only one production of documents in response to Mr. Kadi's document requests, I would like some confirmation that there are no additional responsive non-privileged documents. Additionally, of course, I repeat my earlier request that Plaintiffs comply with Judge Maas's direction that as to each objection (other than for privilege) you state whether documents are being withheld on the basis of that objection. As stated in my May 7 letter, we will of course provide that same information once we have completed our production.

Scott Tarbutton, Esq.

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September 9, 2014

I look forward to hearing from you shortly.

Sincerely,



Amy Rothstein

cc by email: Robert Haeefe, Esq.
Defense Counsel